

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

HOUSING RIGHTS INITIATIVE, *et al.*

Plaintiffs,

v.

BOZZUTO MANAGEMENT COMPANY, *et al.*

Defendants.

Case No. 20-cv-1956

**DEFENDANTS' MOTION TO DISMISS
PLAINTIFFS' FIRST AMENDED COMPLAINT**

Pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6), Defendants Bozzuto Management Company ("Bozzuto"), Greystar Management Services L.P. ("Greystar"), Kettler Management, Inc. ("Kettler"), Wood Residential Services, LLC ("Wood"), JBG SMITH Management Services, LLC ("JBG Smith"), Pinnacle Campus Living LLC ("Pinnacle"), Tower Construction Group, LLC (i/p/a The Tower Companies) ("Tower"), Vantage Management, Inc. ("Vantage"), and Berkshire Communities, LLC ("Berkshire") hereby move to dismiss all claims asserted in Plaintiffs' First Amended Complaint with prejudice.

Respectfully submitted,

/s/ Lynn E. Calkins
Lynn E. Calkins, Bar No. 12121
Holland & Knight LLP
800 17th Street, N.W., Suite 1100
Washington, D.C. 20006
Telephone: (202) 955-3000
lynn.calkins@hklaw.com

Counsel for Bozzuto Management Company

/s/ Matthew M. Moore
Matthew M. Moore, Bar No. 14030 *
Thomas John Gartner, Bar No. 18808
Shulman Rogers
12505 Park Potomac Ave., 6th Floor
Potomac, MD 20854
Telephone: (301) 230-6560
mmoore@shulmanrogers.com

*Counsel for Greystar Management
Services L.P.*

/s/ Sharon Oras Morgan
Sharon Oras Morgan, Bar No. 29663 *
W. Christian Moffitt, *pro hac vice* *
Fox Rothschild LLP
10 Sentry Parkway, Suite 200
Blue Bell, PA 19422
Telephone: (610) 397-7073
cmoffit@foxrothschild.com

Counsel for Kettler Management, Inc.

/s/ Grace E. Speights
Grace E. Speights, Bar No. 05254 *
Morgan Lewis & Bockius LLP
111 Pennsylvania Ave. NW
Washington, DC 20004
Telephone: (202) 739-5189
grace.speights@morganlewis.com

Counsel for JBG SMITH Management Services, L.L.C.

/s/ Michael Jaffe
Michael Evan Jaffe, Bar No. 06694 *
David C. Grossman, Bar No. 21260
Pillsbury Winthrop Shaw Pittman LLP
1200 17th Street, NW
Washington, DC 20036
Telephone: (202) 663-8068
michael.jaffe@pillsburylaw.com
david.grossman@pillsburylaw.com

Counsel for Tower Construction Group LLP

/s/Emmett F. McGee, Jr.
Adriana R. Midence, *pro hac vice*
Emmett F. McGee, Jr., Bar No. 08462*
Eric R. Mangus, *pro hac vice*
Kelli Church, *pro hac vice*
Jackson Lewis P.C.
171 17th Street, NW, Suite 1200
Atlanta, GA 30363
Telephone: (404) 586-1822
adriana.midence@jacksonlewis.com

Counsel for Wood Residential Services, LLC

/s/ Leslie Paul Machado
Leslie Paul Machado, Bar No. 14952 *
O'Hagan Meyer
2560 Huntington Avenue
Suite 204
Alexandria, VA 22303
Telephone: (703) 775-8607
lmachado@ohaganmeyer.com

Counsel for Pinnacle Campus Living LLC

/s/ H. Matson Cox, IV
H. Matson Cox, IV, Bar No. 19388*
Elisabeth L. Shu, *pro hac vice*
Wilson Elser Moskowitz Edelman & Dicker, LLP
8444 Westpark Drive, Suite 510
McLean, VA 22102
Telephone: (703) 852-7793
lisa.shu@wilsonelser.com
H.Matson.CoxIV@wilsonelser.com

Counsel for Vantage Management Inc.

/s/ Kathleen Pontone
Kathleen Pontone, Bar No. 01225 *
Elisabeth Koloup Hall, Bar No. 18734
Miles and Stockbridge PC
100 Light Street, 10th Floor
Baltimore, MD 21202
Telephone: (410) 385-3757
kpontone@milesstockbridge.com

Counsel for Berkshire Communities, LLC

** Signed by Lynn E. Calkins with permission
of the signing attorney*